## UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

J.B. INTERNATIONAL, LLC	§	
d/b/a J. BIRNBACH	§	
	§	
Plaintiff,	§	
	§	Civil Action No. 3:22-cv-01422
v.	§	
	§	
WILLIAM NOBLE RARE JEWELS, L.P.	§	
and WILLIAM NOBLE,	§	
	§	
Defendants.	§	

## JB INTERNATIONAL, LLC D/B/A J. BIRNBACH'S WITNESS LIST FOR TRIAL

Pursuant to the Scheduling Order [Doc. # 27] entered by the Court on February 7, 2023, JB International, LLC d/b/a J. Birnbach's ("JB International") hereby files its Witness List for the trial on January 16, 2024.

### **Probable Witnesses**

Witness Name	Address	Testimony	Time Length
Jonathan Birnbach	c/o Kaminski Law,	Mr. Birnbach will testify	4-5 hours
	PLLC	regarding the underlying	
	Shanna M. Kaminski	business relationship	
	P.O. Box. 725220	between the parties, the	
	Berkley, MI 48072	relevant invoices and	
	(248) 462-7111	memorandums as well as the	
		amounts due and owing, the	
		default by the Defendants,	
		and conversations between	
		the parties. Further, Mr.	
		Birnbach will testify	
		regarding Plaintiff's	
		damages and the need to	
		hire and pay counsel.	
William "Bill" Noble	c/o Crawford,	Mr. Noble is a defendant and	60-90 minutes
	Wishnew & Lang,	corporate representative of	
	PLLC	the other defendant. Mr.	
	1700 Pacific Ave.	Noble is expected to testify	
	Suite 2390	regarding the business	
	Dallas, TX 75201	transactions at issue, the	

		disposition of the subject products, the various defaults under the obligations subject of this suit, and the balances owed.	
Shanna M. Kaminski	c/o Kaminski Law, PLLC Shanna M. Kaminski P.O. Box. 725220 Berkley, MI 48072 (248) 462-7111	Ms. Kaminski will testify via narrative regarding the attorney's fees incurred in this matter by Plaintiff.	15 minutes

## **Possible Witnesses**

Witness Name	Address	Testimony	Time Length
Jeffrey A. Mitchell	Unknown (will		
	supplement if able)		
Brandon J. Gibbons	420 Throckmorton St.	Mr. Gibbons will testify via	15 minutes
	Suite 1210	narrative regarding the	
	Fort Worth, TX 76102	attorney's fees incurred in	
		this matter by Plaintiff.	
Mark W. Stout	420 Throckmorton St.	Mr. Stout will testify via	15 minutes
	Suite 1210	narrative regarding the	
	Fort Worth, TX 76102	attorney's fees incurred in	
		this matter by Plaintiff.	

# **Expert Witnesses**

Witness Name	Address	Testimony	Time Length
Brandon J. Gibbons	420 Throckmorton St.	Expert testimony will be on	15 minutes
	Suite 1210	fees.	
	Fort Worth, TX 76102		
Mark W. Stout	420 Throckmorton St.	Expert testimony will be on	15 minutes
	Suite 1210	fees.	
	Fort Worth, TX 76102		
Shanna M.	c/o Kaminski Law,	Ms. Kaminski will testify via	15 minutes
Kaminski	PLLC	narrative regarding the	
	Shanna M. Kaminski	attorney's fees incurred in	
	P.O. Box. 725220	this matter by Plaintiff.	
	Berkley, MI 48072		
	(248) 462-7111		

### **Record Custodians**

Witness Name	Address	Testimony	Time Length
Jonathan Birnbach	c/o Kaminski Law,	Mr. Birnbach will testify	4-5 hours
	PLLC	regarding the underlying	
	Shanna M. Kaminski	business relationship	
	P.O. Box. 725220	between the parties, the	
	Berkley, MI 48072	relevant invoices and	
	(248) 462-7111	memorandums as well as	
		the amounts due and owing,	
		the default by the	
		Defendants, and	
		conversations between the	
		parties. Further, Mr.	
		Birnbach will testify	
		regarding Plaintiff's	
		damages and the need to	
		hire and pay counsel. Mr.	
		Birnbach will prove up the	
		applicable documents and	
		business records.	

Plaintiff further cross-designates any and all individuals and/or corporate representatives of any entities designated by the Defendants, regardless of whether such witness designation is made solely for rebuttal or for other purposes. Additionally, Plaintiff reserves the right to supplement or amend as needed within the confines of the Federal Rules of Civil Procedure and reserves the right to call witnesses in rebuttal.

Dated: December 18, 2023

Respectfully Submitted,

PADFIELD & STOUT, L.L.P.

420 Throckmorton Street, Suite 1210 Fort Worth, Texas 76102 (817) 338-1616 - Telephone (817) 338-1610 - Facsimile

/s/ Brandon J. Gibbons

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Brandon J. Gibbons
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Local Counsel for Plaintiff

#### KAMINSKI LAW, PLLC

/s/ Shanna M. Kaminski\_\_\_\_

By: Shanna M. Kaminski MI Bar No. P74013 P.O. Box. 725220 Berkley, MI 48072 (248) 462-7111 skaminski@kaminskilawpllc.com

Attorneys for Plaintiff

## **CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of the foregoing has been forwarded to the counsel of record via e-service on December 18, 2023.

/s/ Brandon J. Gibbons
Brandon J. Gibbons